

# **Exhibit 32**

### **DECLARATION OF YATTA KIAZOLU**

I, Yatta Winnie Kiazolu, declare the following:

1. I am one of the Plaintiffs in this lawsuit.
2. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.
3. I have been lawfully residing in the United States for about twenty-two years. I arrived in the United States in 1997 when I was six years old. I first received DED status in 2007, and I am currently a DED holder.
4. I am submitting this declaration to describe the harm my family and I have suffered since the announcement of the termination of DED for Liberians, and the harm my family and I would suffer if DED is terminated.

### **Background**

5. I am 28 years old and I live in Los Angeles, California.
6. I was born in Botswana in 1990 to Liberian parents. My parents raised me in Botswana but I obtained Liberian nationality because the country's laws at the time required children to take the citizenship of their father. Even though I have Liberian nationality, I have never lived in the country.
7. Around 1992-1993, my mother made an initial asylum application in the United States because of the war in Liberia and an attempt to leave an abusive marriage. My father convinced her to abandon the application in effort to keep the family together.
8. In 1997, my father accepted a position in Liberia after Charles Taylor's election and my parents attempted to return to the country. Considering the state of their marriage and the dangerous political climate in Liberia, my mother sent me to stay with my grandmother in

Georgia that same year for my safety and stability. My mother was able to join me in the United States about a month after I arrived.

9. Together, my mother and I lived with my aunt, uncle, three cousins, and grandmother in a crowded three-bedroom apartment in Decatur, GA. The love and support of our family members made an incredible impact on our ability to transition, heal, and begin new lives in the United States. My mother then remarried to my stepfather who has helped raise me since I was eight years old.

10. Even though my mother, stepfather, and grandmother are permanent residents or U.S. citizens, I have not been able to obtain permanent residency. My family tried to obtain immigration status for me through the Diversity Lottery and family sponsorship. I aged out of obtaining immigration status through my grandmother's citizenship petition for me when I turned 21. My stepfather, who is a U.S. citizen, applied for me in 2016; however, there is a backlog by at least seven years.

11. I became a recipient of TPS in 2002 and later DED. These immigration relief programs allowed me to obtain a driver's license at 16 years old along with my peers and, later, start my first job. However, the inability to obtain permanent residency meant that I could not access financial aid to attend college or pay in-state tuition despite graduating from an in-state school with honors. This was a reality that I was completely unaware of until my senior year.

12. Through the kindness, generosity, and sacrifice of my U.S. citizen aunt, I obtained private student loans that helped me transition from Delaware Technical Community College to Delaware State University, where I graduated magna cum laude with a degree in history in 2012. While I was at Delaware State University, I was a supplemental instruction leader for the

university and worked for an education and youth program for at-risk and college bound adolescent girls through my sorority, Delta Sigma Theta.

13. During my time in college, I discovered my passion for history and pursuing a career in higher education.

14. After I graduated from college, I worked for the Boys and Girls Club as a membership and administrative coordinator.

15. With DED, I was able to leave the United States in 2012 for the first time since my arrival to travel to South Africa in order to participate in the University of California's Office of the President UC-HBCU Initiative. This program exposed me to graduate education and is the reason why I decided to pursue my doctorate in history at UCLA.

16. I started my doctorate program in the Department of History at UCLA in the fall of 2013. My dissertation will focus on the contemporary African diaspora during the 20<sup>th</sup> century in the United States. At UCLA, I have been a teaching assistant for undergraduate courses and I was a campus climate and diversity program coordinator for the Graduate Student Resource Center. Outside of UCLA, I was an English and History tutor at the Social Justice Learning Institute. I have also taught history courses as an adjunct instructor at California State University, Long Beach and Delaware State University.

### **Impact of Deferred Enforced Departure**

17. With my DED status, I can obtain employment authorization. Normally I apply for employment authorization after the White House and the Federal Register announce the extension of DED. To get the authorization, I have to fill out a form along with providing proof of my TPS approval and proof of previous work authorizations. I also pay fees of for biometric

analysis and the work authorization form. I mail everything to the designated UCIS office and I usually receive the work authorization two months after I mail my documents.

18. More recently, after the March 2018 termination of DED, we were given a 6-month automatic extension for work authorization which ended in September 2018. I applied in May for renewal but did not receive my new work authorization until February 2019 about 7 weeks before DED will expire again.

19. But overall, I have benefited greatly from DED. In addition to having the stability offered by the relief program, I have been able to have peace of mind. I can imagine a career for myself as a young adult, and I have been able to meet social milestones with my peers. DED has also allowed me to think of my role and place in society.

20. DED has enabled me to go to school and get an education. Through DED, I was able to get student loans with a U.S. co-signer. With those loans I went to college and got a bachelor's degree. I was also able to qualify for a fellowship through the University of California that funds my graduate program at UCLA. If I lose DED, I will likely lose my fellowship that covers my tuition.

21. I would never have any of these benefits if I lived in Liberia.

### **Impact of the Decision to Terminate DED**

22. When I found out that DED was ending, it was very difficult for me. The termination of DED has taken a toll on my mental and emotional wellbeing. I have increased anxiety, trouble sleeping, headaches, tension, and panic attacks. I have to see a therapist because of the anxiety the end of DED has caused me.

23. I am trying to graduate from UCLA and file my dissertation this year. If DED ends and I am expected to go back to Liberia, I will have a difficult time completing my

research and graduate as expected. Ending DED will interrupt my professional development. In Liberia, I would have to start all over again.

24. I would lose my assets here as well. I have U.S. bank accounts and I am afraid of losing them.

25. I also have debts from my student loans and I do not know how I would pay them back if I have to move to Liberia. I know that Liberia has a very high unemployment rate and the economy is not doing well. I heard that there are initiatives in Liberia that prefer giving jobs to Liberians instead of foreigners. As someone who has lived in the U.S. for a long time and never lived in Liberia, I have no idea how I will be perceived and if I could even get a job. If I cannot pay back my student loans, my aunt in the U.S will suffer because she co-signed my loans with me and will be responsible for the debt.

26. I am afraid about living in Liberia because I have never lived there. I have no idea what living in Liberia is like. I only visited Liberia once when I was four and I do not remember anything there.

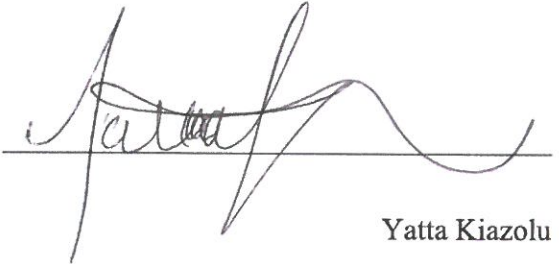
27. I know that Liberia doesn't have strong infrastructure. The health care system is poor. I have family members who died because of simple ailments that are normally not an issue in the U.S. If Liberia had a strong health system, their deaths could have been prevented. My uncle died this past summer; I think he died from high blood pressure that could have been treated if he had the appropriate preventative care.

28. The end of DED is also harming my family. I would be separated from the majority of my family who live in the U.S. Most of them are U.S. citizens and don't have to worry about moving back to Liberia like I do. The separation would be painful. Also, my mom who is a permanent resident here is worried about my future and has trouble sleeping.

29. I engage in different forms of advocacy to highlight the experiences of DED holders in the U.S. A couple of weeks ago, I participated in an Action Day on Capitol Hill with UndocuBlack and TPS Alliance to raise awareness about DED. In the past, whenever DED was set to expire, I signed many petitions and made a bunch of phone calls to pressure policy makers to extend the program. I have participated in many rallies and marches about DED. With my personal network, I also share information about what DED is and why it would be harmful to end the program.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 4<sup>th</sup> day of March 2019, in Los Angeles, California.

A handwritten signature in black ink, appearing to read 'Yatta Kiazolu', is written over a horizontal line. The signature is stylized with a large initial 'Y' and a long, sweeping flourish that extends to the right.

Yatta Kiazolu